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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION This Document Relates To: ALL CASES	MDL NO. 06-1791 VRW **DECLARATION OF JOHN A. ROGOVIN IN SUPPORT OF VERIZON'S ADMINISTRATIVE MOTION TO EXCEED OTHERWISE APPLICABLE PAGE LIMITS IN ITS MOTION TO DISMISS PLAINTIFFS' MASTER CONSOLIDATED COMPLAINT** **[Civ. L.R. 7-11]**

I, John A. Rogovin, declare as follows:

1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. My firm is counsel for the Verizon defendants in this matter. Pursuant to Northern District of California Civil Local Rule 7-11(a), I make this declaration in support of Verizon's Administrative Motion To

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Exceed Otherwise Applicable Page Limits In Its Motion To Dismiss Plaintiffs' Master Consolidated Complaint.

2. For the reasons discussed in Verizon's motion, an extension of the page limit is necessary to permit Verizon to properly address the complex claims and legal issues raised by Plaintiffs' Master Consolidated Complaint.

3. I contacted counsel for Plaintiffs in an attempt to reach a stipulation regarding this matter. On Monday, March 19, 2007, I spoke with Barry Himmelstein, lead counsel for the MCI Plaintiffs. He indicated that the MCI Plaintiffs oppose Verizon's requested extension. Also on Monday, I spoke to Jodi Flowers, lead counsel for the Verizon Plaintiffs. Ms. Flowers indicated that the Verizon Plaintiffs oppose Verizon's request for leave to file a 95-page brief but would agree to an extension of the page limit to 75 pages as long as Plaintiffs were given the same extension.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 19, 2007 . /s/ John A. Rogovin

John A. Rogovin